

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. This paper is filed in response to the Office Action.

Claims 7, 9–17 and 19–21 remain in this application. The remaining claims have been canceled.

Claims 7, 17 and 19–21 are indicated as being allowable by the Examiner. Claims 15 and 16 are objected to, but were indicated as being allowable if put into independent format.

Claims 9–14 are newly rejected under 15 U.S.C. §103(a) as being unpatentable over Flom *et al* (U.S. 4,641,349) in view of Cambier *et al.* (U.S. 6,532,298). For the following reasons, the rejection is respectfully traversed.

Claim 9 recites an iris camera module comprising:

an image pickup optical system for picking up an image of the iris of a user; and

a target optical system including *a target screen* for displaying *a target* for aligning the eye of the user, wherein the target optical system and the image pickup optical system are integrated onto a common substrate.

The newly cited Flom reference does not teach the “target screen” of the claim.

The Examiner cites the target 71 of the reference as teaching a target screen. However, the reference clearly states that item 71 is an illuminated *target* (see col. 8, lines 30–31). The image of this target is not transmitted to a screen, but is optically directed into the eye of the viewer (col. 8, lines 48–51). Thus, like Cambier (as argued previously), there is no screen upon which an image is displayed.

Applicant further notes that the claim recites both a “target” and a “target screen.” Thus, the examiner cannot properly broaden the term “target” to read on a “target screen,” because the claim recites both elements.

Accordingly, claim 9 is patentable over the references, because neither reference teaches both a “target” and a physical “target screen” as recited in claim 9. Claims 10–12, 13 and 14, which depend, directly or indirectly, upon claim 9, are thus patentable over the reference for at least the same reason.

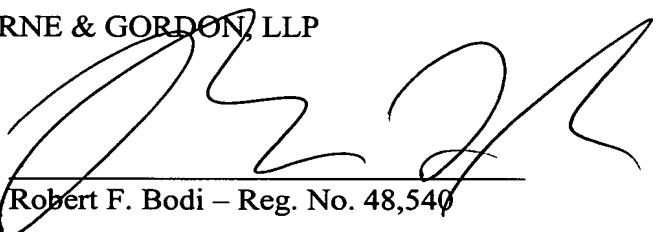
Finally, the motivation for combining the references is not legally sufficient for making a *prima facie* case of obviousness.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 33781.

Respectfully submitted,
PEARNE & GORDON, LLP

By:


Robert F. Bodi – Reg. No. 48,540

1801 East 9th Street
Suite 1200
Cleveland, Ohio 44114-3108
(216) 579-1700

Date: January 17, 2006